

REMARKS

The Applicants wish to thank the Examiner for thoroughly reviewing and considering the pending application. The Office Action dated December 24, 2006 has been received and carefully reviewed. Claims 5, 8, and 10 have been amended. Claims 1-13 are currently pending. Reexamination and reconsideration are respectfully requested.

Initially, the Applicants wish to thank Examiner Warren for speaking with the Applicants' representative on February 27, 2006. During the Telephonic Examiner Interview, the pending claims along with the cited references were discussed.

The Office Action rejected claims 1, 3-6, and 8-12 under 35 U.S.C. § 103(a) as being unpatentable over the Applicants' Related Art (hereinafter "the *ARA*") in view of U.S. Patent No. 5,637,007 to *Suzuki et al.* (hereinafter "*Suzuki*"). The Applicants respectfully traverse the rejection.

As required in Chapter 2143.03 of the M.P.E.P., in order to "establish *prima facie* obviousness of the claimed invention, all the limitations must be taught or suggested by the prior art." The Applicants respectfully submit that neither the *ARA* nor *Suzuki*, either singularly or in combination, disclose or suggest each and every element recited in claims 1, 3-6, and 8-12.

Claim 5 has been amended to recite a lamp apparatus comprising, among other features, a lamp housing for enclosing a lamp and a wire "wherein a first portion of the wire contacts a first portion of the lamp housing" and a resin "wherein the resin separates the wire from the lamp housing at a second portion of the lamp housing." During the Telephonic Examiner Interview, the Examiner kindly pointed out that this amendment defines subject not disclosed or suggested, either singularly or in combination, in any of the cited references.

Therefore, the Applicants submit that claim 5, along with claim 6 which depends therefrom, is patentable over the *ARA* in view of *Suzuki* and request that the rejection be withdrawn.

Claim 8 has been amended to recite a liquid crystal display module comprising, among other features, a lamp housing for enclosing a lamp and a wire “wherein a first portion of the wire contacts a first portion of the lamp housing” and a resin “wherein the resin separates the wire from the lamp housing at a second portion of the lamp housing.” During the Telephonic Examiner Interview, the Examiner kindly pointed out that this amendment defines subject not disclosed or suggested, either singularly or in combination, in any of the cited references. As such, claim 8 is patentable over the cited references and the Applicants request that the rejection be withdrawn. Likewise, claim 9, which depends from claim 8, is patentable for at least the same reasons.

Claim 10 has been amended to recite a lamp apparatus for a liquid crystal display, comprising, among other features, a lamp housing enclosing a holder and a lamp “wherein a first portion of the wire contacts a first portion of the lamp housing” and a resin “wherein the resin separates the wire from the lamp housing at a second portion of the lamp housing.” During the Telephonic Examiner Interview, the Examiner kindly pointed out that this amendment defines subject not disclosed or suggested, either singularly or in combination, in any of the cited references. Accordingly, claim 10, along with claims 11 and 12 which depend from claim 10, is patentable over the cited references and the Applicants request that the rejection be withdrawn.

Moreover, there is no motivation to combine the references. In order to establish a *prima facie* case of obviousness, there must at least be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine the reference teachings. See MPEP § 2142.

Furthermore, the teaching or suggestion which results in the claimed combination must be found in the references themselves and not be based on the disclosure of the Applicants using improper hindsight. The references must expressly or impliedly suggest the claimed invention or the Office Action must have a convincing line of reasoning as to why one of ordinary skill in the art would have found the claimed invention obvious in light of the references in order to support the conclusion that the claimed invention is directed to obvious subject matter.

When the motivation to combine the references is not immediately apparent, the Office Action must explain why the combination of the teachings is proper. The fact that references may be combined does not render the resultant combination obvious unless the prior art suggests the desirability of the combination. See M.P.E.P. § 2143.01. Therefore, the fact that the references may indicate all aspects of the claimed invention were individually known in the art is not sufficient to establish a *prima facie* case of obviousness without some objective reason to combine the teachings of the reference.

In view of the above, and for the additional reasons set forth below, the Applicants respectfully submit that a *prima facie* case of obviousness has not been established with regard to the presently claimed invention.

Suzuki discloses a connector device for a hydraulic circuit mounted within a housing of an automatic transmission. *See e.g.*, col. 1, ll. 5-8. More specifically, *Suzuki* teaches a connector device C having a plurality of wires 3 and male terminals connected to front ends of the wires 3 where the wires 3 are inserted into an insertion hole 5. *See e.g.*, col. 3, ll. 41-45 and ll. 56-60. In addition, *Suzuki* teaches a sealer 10 which prevents leaking oil from intruding into the insertion hole 5. *See e.g.*, col. 4, ll. 20-22. The *ARA* relates to a LCD device having a lamp apparatus which includes a lamp 2, a wire 3 and a soldering portion 4. *Suzuki* does not disclose

or even suggest the desirability of somehow incorporating the sealer 10 used for an automatic transmission as taught therein with the lamp apparatus of a LCD device taught in the *ARA*. Similarly, the *ARA* does not disclose or even suggest the desirability of incorporating the sealer 10 with the lamp apparatus taught therein. Therefore, the prior art references in combination do not suggest the claimed invention as a whole. Absent any objective motivation to combine the references, the Applicant respectfully submits that the Office Action merely pieces together isolated disclosures of the cited references using the present invention as a template with impermissible hindsight. Accordingly, one of ordinary skill would not have been motivated to combine the teachings of these two references as suggested by the Official Action.

Moreover, according to M.P.E.P. § 2141.01(a), a reference relied upon under 35 U.S.C. § 103 must be an analogous reference. “In order to rely on a reference as a basis for rejection of an Appellant’s invention, the reference must either be in the field of Appellant’s endeavor or, if not, then be reasonably pertinent to the particular problem with which the inventor was concerned.” For the reasons set below, the Applicants respectfully submit that *Suzuki* is nonanalogous prior art and is not available as a reference under 35 U.S.C. §103.

First, the Applicants submit that the fields of endeavor between the *ARA* and *Suzuki* are not the same. The Applicants respectfully submit that the field of invention of the *ARA* relates to “a liquid crystal display, and more particularly to a lamp apparatus for a liquid crystal display...” See page 2, lines 9-11 of the originally filed specification. Nonetheless, the invention of *Suzuki* relates to “a connector device, and more particularly to a connector device for connecting a sheathed wire, connected to a control element of a hydraulic circuit mounted within a housing of an automatic transmission, to a control device provided outside of the

housing.” See col. 1, lines 5-9. As such, the Applicants respectfully submit that the fields of endeavor between the *ARA* and *Suzuki* are not the same.

Secondly, the Applicants believe that *Suzuki* is not reasonably pertinent to the particular problem with which the *ARA* is concerned. In the background section, *Suzuki* describes, at col. 1, line 50 - col. 2, line 19, the object of the invention disclosed therein as such:

In the above conventional technique, however, the liquid-state resin sealer, when poured into the casing, often leaks through a gap between each terminal passage hole 57, formed through the terminal support wall 56 within the housing casing 51, and the associated terminal 54, extending through the terminal passage hole 57, to a fitting surface of the terminal support wall 56. More specifically, the resin 58 flows from the insertion hole 53 to the terminal hole 55 through the gap between the terminal passage hole 57 in the partition wall 56 and the terminal 54, thus forming a bulged flow-out portion 60A at a region between the surface of the terminal 54 and the outer surface of the partition wall 56, as shown at a left portion of FIG. 6. This flow-out portion 60A is formed into an agglomerate upon curing of the resin. This agglomerate of the resin is an obstacle to the advance of a guide portion of a mating connector housing C51, so that the connector device C50 and the mating connector C51 cannot be completely fitted together.

Furthermore, as shown at a right portion of FIG. 6, the leaked liquid-state sealer spreads or diffuses over the surface of the front end portion of the terminal 54 to form a covering layer 60B thereon, so that there is a possibility that the terminal 62 incompletely contacts a mating terminal.

Recently, automatic transmissions have advanced in quality, and not only electric parts but also sensors and electrically-operated actuators have been extensively used, so that the number of wires inserted into connector devices has increased. With the increase in the number of the wires, the number of wire insertion holes increases, and the leakage of liquid-state sealer may also increase.

It is an object of this invention to overcome the above problems of conventional connectors, and more specifically to provide a connector device for a hydraulic circuit in which female and male connector housings can be positively fitted together completely,

and female and male terminals can be positively connected electrically.

The Applicants believe that the field of endeavor between the *ARA* and *Suzuki* are not the same. Moreover, as established above, the particular problems with which the *ARA* and *Suzuki* are concerned are not the same nor even remotely similar. Therefore, the dissimilar subject matter between the *ARA* and *Suzuki* and the dissimilar problems addressed by the *ARA* and *Suzuki* would not have logically commended itself to one of ordinary skill in the art considering the problem with which either is associated to turn to either reference to achieve the combination suggested by the Official Action. Thus, the Applicants respectfully submit that the Official Action has not shown that a person of ordinary skill in the art, seeking to solve the problems set forth in the *ARA* as discussed above, would reasonably be expected or motivated to look to a connector connected to a control element of a hydraulic circuit mounted within a housing of an automatic transmission, as discussed above, in order to achieve the presently claimed invention.

As such, the Applicants respectfully submit that a *prima facie* case of obviousness has not been established and claims 1, 3, 5, 8 and 10 are patentable under 35 U.S.C. §103(a) over the *ARA* in view of *Suzuki* and respectfully request that the rejection be withdrawn. Likewise, claim 4, which depends from claim 3 and claim 6, which depends from claim 5, are also patentable for the same reasons discussed above and for the additional novel features recited therein. Furthermore, claim 9, which depends from claim 8 and claims 11 and 12, which depend from claim 10, are patentable as previously mentioned with reference to claims 8 and 10 and for the additional novel features claimed therein.

Furthermore, the Office Action rejected claims 2, 7, and 13 under 35 U.S.C. § 103(a) as being unpatentable over the *ARA* in view of *Suzuki* as applied to claims 1, 5, and 10 above and further in view of JP 4-46314 to *Saito* (hereinafter "*Saito*"). The Applicants respectfully traverse the rejection.

Claim 2 depends from claim 1. As discussed above, the Applicants submit that claim 1, from which claim 2 depends, is patentably distinct over the *ARA* in view *Suzuki*. The Applicants submit that *Saito* does not address the shortcomings of the *ARA* and *Suzuki*. More specifically, *Saito* does not provide the motivation to combine the disclosure of the *ARA* with *Suzuki* to arrive at the invention claimed in claim 1. *Saito* pertains to obtaining:

...a liquid crystal display element having high reliability by providing a pair of clamping plates which clamp a liquid crystal cell and pressing means which press the clamping plates. See Abstract of *Saito*.

Therefore, the Applicants respectfully submit that a *prima facie* case of obviousness has not been established and claim 2 is patentable under 35 U.S.C. §103(a) over the *ARA* in view of *Suzuki* as applied to claim 1 above and further in view of *Saito* and respectfully request that the rejection be withdrawn.

Claims 7 and 13 depend from claims 5 and 10, respectively. As kindly pointed out by the Examiner during the Telephonic Examiner Interview, claims 5 and 10 include subject matter not disclosed in the cited references. Accordingly, claims 7 and 13 are also patentable over the cited references and the Applicants request that the rejection be withdrawn.

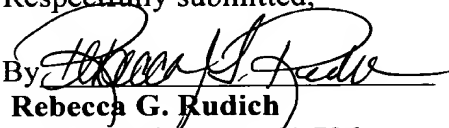
The application is in a condition for allowance and favorable action is respectfully solicited. If for any reason the Examiner believes a conversation with the Applicant's representative would facilitate the prosecution of this application, the Examiner is encouraged to

contact the undersigned attorney at (202) 496-7500. All correspondence should continue to be sent to the below-listed address.

If these papers are not considered timely filed by the Patent and Trademark Office, then a petition is hereby made under 37 C.F.R. §1.136, and any additional fees required under 37 C.F.R. §1.136 for any necessary extension of time, or any other fees required to complete the filing of this response, may be charged to Deposit Account No. 50-0911. Please credit any overpayment to deposit Account No. 50-0911. A duplicate copy of this sheet is enclosed.

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Respectfully submitted,

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